HABBA MADAIO & ASSOCIATES LLP

Alina Habba, Esq. 1430 US Highway 206, Suite 240 Bedminster, New Jersey 07921 -and-

112 West 34th Street, 17th & 18th Floors

New York, New York 10120 Telephone: (908) 869-1188 Facsimile: (908) 450-1881 E-mail: ahabba@habbalaw.com

Attorneys for defendant Donald J. Trump

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

Civil Action No.: 1:20-cv-7311-LAK-JLC

DECLARATION OF ALINA HABBA, ESQ. IN SUPPORT OF DEFENDANT'S MOTIONS IN LIMINE

- I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:
- 1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for Donald J. Trump (the "Defendant") in the above-captioned matter (the "Action").
- 2. I submit this declaration pursuant in support of Defendant's Motions *in Limine*. The facts herein are true and correct and, unless otherwise stated, are within my personal knowledge.
- 3. As counsel for Defendant, I have reviewed pleadings, and other documents related to the Action, and I am familiar with the facts and circumstances of this case.

- 4. Attached hereto as **Exhibit A** is a true and accurate copy of relevant portions of the deposition transcript of Natasha Stoynoff, which deposition took place October 13, 2022;
- 5. Attached hereto as **Exhibit B** is a true and accurate copy of the relevant portions of the deposition transcript of Jessica Leeds, which deposition took place on October 13, 2022.

Dated: February 16, 2023 Respectfully submitted,

Alina Habba, Esq.

Habba Madaio & Associates LLP 1430 US Highway 206, Suite 240 Bedminster, New Jersey 07921

-and-

112 West 34th Street, 17th & 18th Floors

New York, New York 10120 Telephone: (908) 869-1188 Facsimile: (908) 450-1881

E-mail: ahabba@habbalaw.com

Attorneys for Defendant, Donald J. Trump